



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
Natural Resources Conservation Council
RELAY SERVICE FOR THE HEARING IMPAIRED
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AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Hazardous Materials Management Division
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May 2, 1995

Mr. William Tremblay
St. Johnsbury Paper Company
50 Bay St.
St. Johnsbury, VT 05819

RE: 13 Portland St. in St. Johnsbury (Site #94-1711)

Dear Mr. Tremblay:

The Sites Management Section (SMS) has received Dufresne-Henry, Inc.'s "Report on Limited Subsurface Investigation" dated April 10, 1995 for the above referenced site. As stated in the report, one test boring was drilled to groundwater, and a water sample and two soil samples were submitted for laboratory analysis. Analytical results of the samples indicate petroleum contaminants to be present in soil and groundwater, with benzene being the only contaminant to exceed the Groundwater Enforcement Standard of five parts per billion (ppb). The source of this contamination was not determined.

The SMS's November 8, 1994 letter to the Merchant's Bank, written in response to the Phase I Environmental Assessment by EnviroCorp dated July 26, 1993, stated that further information was needed in order to determine the status of soil and groundwater contamination at the site and whether or not it posed a threat to other sensitive receptors in the area. In a phone conversation between yourself and Chuck Schwer of the SMS on February 6, 1995, you expressed concerns regarding the cost of such an investigation. Mr. Schwer explained to you that the SMS would initially consider a limited site investigation focusing on the "hot" areas on the property; however, if groundwater contamination was found to be above Enforcement Standards, then the SMS would have to consider the need for a full investigation.

Based on the information in both the Phase I Environmental Assessment by EnviroCorp and the Limited Subsurface Investigation by Dufresne-Henry, the SMS reiterates it's request that the following work be performed at the site:

1. Determine the degree and extent of groundwater contamination to the site by installing approximately three groundwater monitoring wells; one background well, and two downgradient wells. Samples should be analyzed by EPA Method 8240.
2. Investigate potential sources of contamination either onsite or offsite which may be

impacting groundwater at the site.


3. Determine the need for a long term treatment and/or monitoring plan which addresses the contamination present at the site. The need for such a plan should be based on the results of the above investigations.
4. Submit to the SMS a summary report which outlines the work performed as well as providing conclusions and recommendations.

Please have your consultant submit to the SMS a work plan which addresses the above, so that it may be approved prior to the initiation of onsite work.

As stated in previous correspondence, often in property transfers an agreement is made between the buyer and the seller that the seller will assume responsibility for further remedial work on the property. This kind of an agreement is between the buyer and the seller; the SMS is not involved in that agreement. If no such agreement is made, the responsibility to perform necessary remedial work at any hazardous site lies both with the generator of the contamination and any current owner of the property.

Feel free to call if you have any questions regarding the above.

Sincerely,



Lynda Provencher, Site Manager
Sites Management Section

c: David Deane, Dufresne-Henry, Inc.